



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

January 29, 2018

Bridget Middleton
Ecolab Inc.
1 Ecolab Place
St. Paul, MN 55102

Subject: Notification per PRN 98-10 – Correct Advisory Statement and Update Marketing Language
Product Name: DrySan Duo
EPA Registration Number: 1677-247
Application Date: 11/07/17
Decision Number: 536298

Dear Ms. Middleton:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Antimicrobials Division (AD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The label submitted with the application has been stamped “Notification” and will be placed in our records.

Should you wish to add/retain a reference to the company’s website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product’s label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA’s Office of Enforcement and Compliance.

If you have any questions, you may contact Terria Northern at 703-347-0265 or via email at northern.terria@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Zeno Bain", written over a horizontal line.

for

Zeno Bain, Product Manager 33
Regulatory Management Branch I
Antimicrobials Division (7510P)
Office of Pesticide Programs

[Note to Reviewer: Items in brackets [YYY] are considered optional and may or may not be included on the final label.]

DrySan Duo

[Cleaner and Sanitizer for Dairy, Food & Beverage Processing Operations and Dairy Farms]
[in] [Cereal Processors,] [Grain Processors,] [Milling Operations,] [Dry Food Ingredient Blending Operations,] [Dairies,] [Dairy Farms,] [Breweries,] [Wineries,] [Beverage Processing Plants,] [Protein,] [and] [Food Processing Plants]

Active Ingredients:

Hydrogen Peroxide.....	0.045%
Isopropanol.....	10.89%
Alkyl (C14, 50%; C12, 40%; C16, 10%)	
Dimethyl benzyl ammonium chloride	0.016%
Octyl decyl dimethyl ammonium chloride.....	0.012%
Didecyl dimethyl ammonium chloride.....	0.007%
Dioctyl dimethyl ammonium chloride.....	0.005%

Inert Ingredients:.....89.025%
Total:.....100.000%

KEEP OUT OF REACH OF CHILDREN

(See [back], [side], [inside], [other] [fold-out] [booklet] [product container] [label(s)] [panel(s)] [container] for [complete] [additional] [information] [directions for use] [precautionary statements] [and] [first aid] [and] [storage and disposal])

~~(Refer to the (MSDS) (SDS) for additional product hazard information)~~

Have the product container or label with you when calling a Poison Control Center or doctor or going for treatment.

FOR MEDICAL EMERGENCIES IN USA OR CANADA, CALL: 1-800-328-0026

FOR MEDICAL EMERGENCIES WORLDWIDE, CALL: 1-651-222-5352 (IN THE USA)

FOR EMERGENCY MEDICAL INFORMATION CALL TOLL-FREE: 1-800-328-0026

OUTSIDE NORTH AMERICA, CALL 1-651-222-5352

PHYSICAL OR CHEMICAL HAZARDS

Combustible. Do not use or store near heat or open flame.

[Note to Reviewer: For containers of 5 gallons or more, the following Environmental Hazards language will appear on the final product label.]

ENVIRONMENTAL HAZARDS

Do not discharge effluent containing the product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product in your sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

CLEANING

DrySan Duo is recommended for use as a cleaner on hard, non-porous food-contact and non-food-contact surfaces such as [water dispensing units],[offices] [extruders,] [driers,] [hoppers,] [ovens,] [mixers,] [conveyors,] [equipment,] [pipelines,] [tanks,] [vats,] [fillers,] [evaporators,] [pasteurizers] [floors,] [walls,] [tables,] [chairs,] [benches,] [drains,] [troughs,] [drip pans] [forklifts,] [tires,] [pallet jacks,] [and] [pallets]. Follow directions for cleaning in dry environments only where wet processes are not tolerated [such as] [low moisture food processing environments,] [grain and cereal processing operations,] [dry blending operations,] [and] [dry storage areas].

CLEANING IN WET ENVIRONMENTS

Remove gross food particles and soil from the surface. Apply DrySan Duo without dilution to the surface. Water rinse or wipe clean. Allow to dry.

CLEANING IN DRY ENVIRONMENTS

Remove gross food particles and soil from the surface. Apply DrySan Duo without dilution to the surface. Wipe clean. Allow to dry.

SANITIZING FOOD CONTACT SURFACES

DrySan Duo is recommended for use as a sanitizer on hard, non-porous food contact surfaces [such as] [extruders,] [driers,] [hoppers,] [ovens,] [mixers,] [conveyors,] [equipment,] [pipelines,] [tanks,] [vats,] [fillers,] [evaporators,] [and] [pasteurizers].

Apply DrySan Duo without dilution to clean surfaces. Apply by spray or circulation techniques to ensure surface is exposed to sanitizer for at least 60 seconds (one minute). Allow surfaces to dry. Do not rinse.

This product is effective against *Staphylococcus aureus* (ATCC 6538), *Escherichia coli* (ATCC 11229), *Escherichia coli* O157:H7 (ATCC 43895), *Listeria monocytogenes* (ATCC 49594), *Salmonella typhimurium* (ATCC 13311), *Pseudomonas aeruginosa* (ATCC 15442), *Cronobacter sakazakii* (ATCC 12868), *Salmonella enterica* (ATCC 10708), *Escherichia coli* O26:H11 (STEC), *Escherichia coli* O45:H2 (STEC), *Escherichia coli* O103:H11 (STEC), *Escherichia coli* O111:NM (STEC), *Escherichia coli* O121:H19 (STEC), and *Escherichia coli* O145:H18 (STEC).

CONTINUOUS TREATMENT OF FOOD CONVEYORS

DrySan Duo is recommended as a sanitizer for use on conveyors during processing.

During processing, apply DrySan Duo without dilution to conveyor with suitable feeding equipment. Controlled volumes are applied to the return portion of the conveyor. During interruptions in operations coarse spray processing equipment with DrySan Duo without dilution. Conveyor equipment must be free of product when applying coarse spray. Conveyor surface ~~should~~ **must** be exposed to sanitizer for at least 60 seconds (one minute). Allow surfaces to air dry. Do not rinse.

SANITIZING HARD, NON-POROUS, NON-EDIBLE OUTSIDE SURFACES OF IMPERMEABLE PACKAGES CONTAINING FOOD OR NON-FOOD PRODUCTS

DrySan Duo is recommended for use as a final sanitizing rinse on hard, non-porous, outside surfaces of impermeable food or non-food packages [such as] [cans,] [pouches,] [containers,] [wraps,] [films,] [non-porous impermeable meat casings removed prior to final packaging,] [and] [shrink wraps].

Apply DrySan Duo without dilution by spray to ensure surface is exposed to sanitizer for at least 60 seconds (one minute). Do not rinse. The treated outside surfaces of impermeable, non-edible packaging such as food wraps and meat casings must be removed and discarded before packaged food products are further processed or consumed.

SANITIZING NON-FOOD CONTACT SURFACES

DrySan Duo is recommended as a sanitizer for use on **hard, non-porous**, non-food contact surfaces [such as] [conveyors] [floors,] [walls,] [tables,] [chairs,] [benches,] [troughs,] [forklifts,] [tires,] [pallet jacks,] [pallets,] [water dispensing units] [and] [offices].

Apply DrySan Duo without dilution to clean surfaces. Apply by spray or circulation techniques to ensure exposure to sanitizer for at least 5 minutes. Allow surfaces to air dry. Do not rinse.

The product is effective against *Staphylococcus aureus* (ATCC 6538), *Escherichia coli* (ATCC 11229), *Escherichia coli* O157:H7 (ATCC 43895), *Listeria monocytogenes* (ATCC 49594), *Salmonella typhimurium* (ATCC 13311), *Cronobacter sakazakii* (ATCC 12868), *Enterobacter aerogenes* (ATCC 13048), *Salmonella enterica* (ATCC 10708), *Escherichia coli* O26:H11 (STEC), *Escherichia coli* O103:H11 (STEC).

SANITIZING NON-POROUS GLOVES AND WATERPROOF GLOVES

DrySan Duo is recommended as a sanitizer for use on non-porous and waterproof gloves [such as] [plastic gloves,] [rubber gloves,] [nitrile gloves,] [latex gloves,] [vinyl gloves,] [and] [polypropylene gloves].

Apply DrySan Duo without dilution to clean gloves. Apply by spray to ensure exposure to sanitizer for at least 60 seconds (one minute). Allow surfaces to air dry. Do not rinse.

FOOTWEAR SANITIZER

DrySan Duo is recommended as a sanitizer for use on outside surfaces of [waterproof] footwear [such as] [boots] [and] [work boots].

Remove soils from [waterproof] footwear before sanitizing. Apply DrySan Duo without dilution by spray to ensure exposure to sanitizer for at least 5 minutes. Allow surfaces to air dry. Do not rinse.

SANITIZING NON-FOOD CONTACT PACKAGING EQUIPMENT

DrySan Duo is recommended as a sanitizer for use on **hard, non-porous**, non-food contact packaging equipment.

Apply DrySan Duo to clean surfaces without dilution. Apply by spray or circulation techniques as appropriate to ensure exposure to sanitizer for at least 5 minutes. Allow surfaces to air dry. Do not rinse.

NOTE: This product may cause clouding of acrylic resins such as Plexiglas®.

STORAGE AND DISPOSAL

DO NOT CONTAMINATE WATER, FOOD OR FEED BY STORAGE OR DISPOSAL

PESTICIDE STORAGE: Product **should must** be kept cool and in a vented container to avoid any explosion hazard.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER HANDLING AND DISPOSAL:

(For containers 5 gallons or less.) Non-refillable container. Do not reuse or refill this container. Triple rinse as follows: Fill container ¼ full with water and recap. Shake for 10 seconds. Drain for 10 seconds after the flow begins to drip. Follow Pesticide Disposal instructions for rinsate disposal. Repeat procedure two more times. Then offer for recycling or reconditioning if appropriate or puncture and dispose of in a sanitary landfill or by incineration.

(For containers >5-55 gallons.) Non-refillable container. Do not reuse or refill this container. Triple rinse as follows: Empty remaining contents into application equipment or a mix tank. Fill the container ¼ full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat procedure two more times. Then offer for recycling or reconditioning if appropriate or puncture and dispose of in a sanitary landfill or by incineration.

(Totes) Verify that the tote is empty. Do not rinse or clean. Seal tote and contact Ecolab for return.

(Note to reviewer: The following will be used only for 32 oz. spray bottle – to be refilled only by customer for reuse of DrySan Duo)

Refillable container. Refill this container with DrySan Duo only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, triple rinse and dispose of rinsate by following pesticide disposal instructions. Offer for recycling or reconditioning if appropriate or puncture and dispose of in a sanitary landfill.

For (Commercial) (and) (Institutional) Use **Only**

Net Contents:	32 Fl Oz (0.95 L)
	5 U.S. Gallons (18.9 L)
	55 U.S. Gallons (208 L)
	300 U.S. Gallons (tote)

Manufactured By:
Ecolab Inc.
1 Ecolab Place
St. Paul, MN 55102

(Made in United States of America) (Made in USA)

DrySan Duo

11/07/2017

EPA Reg. No.: 1677-247

EPA Est. Numbers: 1677-MN-1 (P), 60156-IL-1 (SI), 1677-CA-2(R), 1677-TX-1(D),
1677-IL-2(J), 1677-GA-1(M), 1677-CA-1(S), 1677-WV-1(V), 72806-OK-1(C), 70271-CA-2(A)
Superscript refers to first letter of date code

[Read all labels for directions for use.]



Antimicrobial
Desinfectante

Optional Marketing Language

DrySan™ Duo

Two-Step Cleaner and Sanitizer

KEEP OUT OF REACH OF CHILDREN | MANTÉNGASE FUERA DEL ALCANCE DE LOS NIÑOS

PRODUCT DESCRIPTION

DrySan™ Duo is a ready-to-use, two-step cleaner and sanitizer for use on hard, non-porous food contact and non-food contact surfaces that is especially beneficial for use in low moisture or dry processing environments.

BENEFITS

Promotes Quality Assurance

- DrySan Duo is effective against microorganisms such as *Staphylococcus aureus*, *Escherichia coli*, *Escherichia coli* O157:H7, *Listeria monocytogenes*, *Salmonella typhimurium*, and *Pseudomonas aeruginosa*, and many others as listed in the Directions for Use on the product label
- Combination cleaner and sanitizer in one product, or can be used as a sanitizer
- Registered for continuous treatment of conveyors to help reduce incidence of undesirable microorganisms on critical conveyor surfaces during processing
- Consistently delivers the proper amount of sanitizing solution
- Excellent for spot sanitizing on hard, non-porous surfaces

Delivers Antimicrobial Activity in a Variety of Applications

- Eliminates the need for multiple cleaners and sanitizers – can be used to clean and sanitize in wet and dry environments
- Recommended for use as a final sanitizing rinse on hard, non-porous, outside surfaces of impermeable food or non-food packages
- Recommended for use as a sanitizer on non-food contact surfaces such as floors, walls, forklifts, tires, pallet jacks, etc.
- Can be used to sanitize non-porous and waterproof gloves and outside surfaces of footwear

Convenient and Safer to Use

- Low alcohol – non-flammable formula
- No worker Personal Protective Equipment (PPE) required during use
- Ideal for sanitizing areas where water use is limited
- Dries quickly to help protect water-sensitive equipment

Saves Time and Labor

- Ready-to-use, no-rinse sanitizer
- No mixing or measuring required